

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

NATIONAL FORGE COMPANY, *et, al.*

Debtor.

OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF
NATIONAL FORGE COMPANY,

Plaintiff

And

OFFICIAL COMMITTEE OF RETIREES
OF NATIONAL FORGE COMPANY,

Intervenors

v.

E. ROGER CLARK, both individually and
as an officer and director of National Forge
Company; MAURICE J. CASHMAN, both
individually and as an officer and director of
National Forge Company; DANA
BEYELER, both individually and as an
officer and director of National Forge
Company; ROBERT A KAEMMERER,
both individually and as an officer and
director of National Forge Company;
DANIEL ANTOS; WILLIAM D. BAILEY;
RICHARD A. BREWSTER; JAMES E.
CALDWELL; LARRY CAMPBELL;
JAMES C. CONFER; RICHARD
D'ALESSANDRO; DONALD FISSEL;
JAMES B. HARRIS; THOMAS H.
JACKSON; ASHOK K. KHARE; CARL J.
LUPPINO; CLARENCE E. MASON;
HAROLD MURPHY; PHILIP R.
NONOSEL; CHARLES R. OLSON; JAMES

C.A. No. 04-21 ERIE

D. RUHLMAN; PHILLIP R. SIMONS;)
GLENN E. TURK; RONALD L. YOUNG;)
BARRY ZISCHKAU; J.P. MORGAN)
CHASE & CO., as a Lender and an Agent on)
behalf of Certain Lenders under Various)
Amendments to Amended and Restated)
Credit Agreement dated April 6, 1998 ;)
FLEET BUSINESS CREDIT)
CORPORATION; and NATIONAL CITY)
BANK OF PENNSYLVANIA,)
)
Defendants)

JOINT PROPOSED DISCOVERY/CASE MANAGEMENT PLAN

Plaintiff and Interveners, Official Committee of Unsecured Creditors of National Forge and Official Committee of Retirees of National Forge Company, by their respective counsel, Leech Tishman Fuscaldo & Lampl, LLC and Quinn Buseck Leemhuis Toohey & Kroto, Inc., and Defendants E. Roger Clark, et, al., by their respective counsel, Campbell & Levine, LLC, The McDonald Group, LLP and Duane Morris, LLP, file this Joint Proposed Discovery/Case Management Plan, pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and the Preliminary Scheduling Order dated June 8, 2005:

1. Rule 26(f) Conference. The undersigned counsel for Plaintiff and Intervener and Defendants held a Rule 26(f) Conference on June 15, 2005.
2. Amendments/New Parties. The parties' request that motions to amend their pleadings an/or add new parties be filed on or before August 15, 2005.

3. Initial Disclosures. The parties agreed to serve their Initial Disclosures under Fed.R.Civ.P. 26(a)(1) on or before August 15, 2005.

4. Subjects of Discovery. The parties intend to take pretrial discovery with respect to the claims raised by the Plaintiff and Intervener in the complaint and the defenses of the Defendants to those claims.

5. Discovery Period. The parties request that the following discovery schedule be implemented:

- a. The parties shall complete fact discovery on or before October 6, 2005.
- b. Plaintiff shall submit expert witness reports as contemplated by Fed.R.Civ.P. 26(a)(2)(B) on or before November 6, 2005, with Defendants' expert witness reports due on or before November 6, 2005.
- c. Expert witness depositions, if any, shall be completed on or before December 6, 2005.

6. Changes to Limitations on Discovery. The parties request that the following change be made to the limitations on pretrial discovery imposed by the Federal Rules of Civil Procedure:

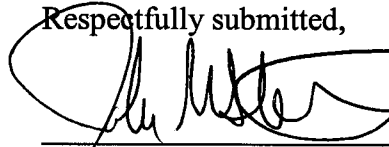
- Change the limitation on the number of interrogatories set forth at Fed.R.Civ.P. 33(a) to permit each party to serve written interrogatories, not exceeding 30 in number including all discrete subparts, without further leave of court or written stipulation.

7. Dispositive Motions. The parties request that dispositive motions be filed on or before January 6, 2005.

8. Challenges to Experts. The parties' request that motions challenging the qualifications of any proposed expert witness and/or the substance of such expert's testimony be filed on or before January 6, 2005.

9. Pretrial Narratives. The parties request that Plaintiff's and Intervener's pretrial narrative statement be filed on or before 30 days after the resolution of dispositive motions, if any; Defendants' pretrial narrative statement shall be filed on or before 20 days after the filing of Plaintiff's and Intervener's pretrial narrative statement.

Respectfully submitted,



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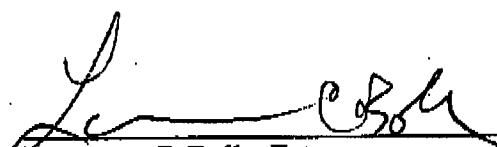
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9. Pretrial Narratives. The parties request that Plaintiff's and Intervener's pretrial narrative statement be filed on or before 30 days after the resolution of dispositive motions, if any; Defendants' pretrial narrative statement shall be filed on or before 20 days after the filing of Plaintiff's and Intervener's pretrial narrative statement.

Respectfully submitted,

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Harold Murphy, Phillip R. Novosel, Charles R. Olson,
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Defendants)

CERTIFICATE OF SERVICE

I, Marlene Proden, secretary to John M. Steiner, of Leech Tishman Fuscaldo & Lampl, LLC, hereby certify that a copy of the foregoing **JOINT PROPOSED DISCOVERY/CASE MANAGEMENT PLAN** was served upon the parties listed below via First Class United States mail, postage prepaid, on the 14th day of July, 2005.

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DATE: 7-14-05


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